UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA, Plaintiff, v. UNIPOINT TECHNOLOGIES, INC. d/b/a COMMUNICATIONS FIDELITY a/k/a COMFI.COM Defendant.	Case No. 1:14-cv-12020-LTS

MOTION FOR LEAVE TO WITHDRAW BY MATTHEW SHAYEFAR

Counsel for Defendant Unipoint Technologies, Inc., Attorney Matthew Shayefar, hereby moves this honorable court to grant leave for Attorney Shayefar and his firm Boston Law Group, PC to withdraw their appearance in this case on behalf of Defendant pursuant to Local Rule 83.5.2(c)(2). In support thereof, Attorney Shayefar states as follows:

1. Communications between Attorney Shayefar and Defendant have broken down.
2. Defendant has not responded to any of Attorney Shayefar's attempts to communicate with Defendant, including emails to previously active email addresses for Defendant.
3. Attorney Shayefar has not heard from Defendant since May of 2015.
4. Attorney Shayefar last attempted to contact Defendant after the Court issued its Order of February 3, 2016, but Defendant failed to respond to Attorney Shayefar.
5. Attorney Shayefar has no instructions from Defendant on how to proceed on this matter.

6. There are no pending motions in this case, nor has a trial date been set, nor has any evidentiary hearing been set.

7. There is only a Joint Status Report due on February 17, 2016, pursuant to which Attorney Shayefar will make his best faith attempts to respond on behalf of Defendant, given that he has no guidance or communication from Defendant on how to respond thereto.

8. Attorney Shayefar cannot reasonably be expected to continue to represent a client with whom he cannot communicate.

9. On the basis of the foregoing, good cause has been shown and the Court should grant Attorney Shayefar leave to withdraw as counsel.

10. Counsel for Plaintiff United States of America has assented to Attorney Shayefar's withdrawal in this matter.

For the reasons set forth herein, Attorney Shayefar requests the Court's leave to file a withdrawal of his and his firm's appearance in this matter.[1]

Respectfully submitted,
Attorney Matthew Shayefar,

/s/ Matthew Shayefar

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Dated: February 16, 2016

[1] To the extent that Attorney Shayefar's co-counsel, Attorney Val Gurvits, has been deemed to have filed an appearance in this case arising from his name's appearance on filings with this Court in this matter, Attorney Gurvits also requests that his appearance be withdrawn from the case.

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

Dated: February 16, 2016 /s/ Matthew Shayefar